<table>
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<th>Project Name</th>
<th>Hong Kong Organic Resources Recovery Centre</th>
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**Description**

In 2009, Hong Kong disposed of about 3,700 tonnes of organic waste to landfill every day, of which 1,000 tonnes originated from commercial and industrial sources. The damaging long-term environmental effects and depletion of the limited landfill void space meant that the development of a sustainable solution was urgently required. Building on the success of a pilot composting facility commissioned in 2008, Hong Kong’s Environmental Protection Department (EPD) sought to develop Organic Resources Recovery Centres (ORRCs) in several phases. The first two phases use anaerobic digestion technologies, followed by composting, to transform the organic waste into useful compost products and biogas for energy recovery.

The project was developed by EPD to treat source-separated organic waste (mainly food waste) arising in Hong Kong, thereby reducing the reliance on landfills and producing renewable heat/power and compost. The Government of Hong Kong is developing a network of around five to six ORRCs with a total recycling capacity of about 1,300 - 1,500 tonnes per day (tpd), over a number of years, using a similar approach each time, for achieving waste reduction targets. The phased development should allow for increasing treatment of separated food waste, as awareness and uptake of waste separation grows. The first ORRC called OPARK1 has been operational since July 2018 with the capacity to treat 200 tpd of food waste. As of May 2019, ORRC2 is in procurement and will be able to treat up to 300 tpd, the feasibility of ORRC3 is being assessed and the remaining ORRC’s are under review.

**Location**

- **OPARK1**: Siu Ho Wan in North Lantau, Hong Kong
- **ORRC2**: Sha Ling in North District, Hong Kong (pending funding approval from the Legislative Council)
- **ORRC3**: Shek Kong in New Territories, Hong Kong (planning and feasibility study stage)
**Project Name** | Hong Kong Organic Resources Recovery Centre
---|---
**Owner** | Environmental Protection Department (EPD)
**Private Partner** | OPARK1: OSCAR Bioenergy (Suez Environment, ATAL Engineering Limited, SITA Waste Services Limited, RosRoca) ORRC2: Currently in procurement

**PPP Model** | Design-build-operate-maintain (DBOM)
**Operating Term** | 15 years

**Contract Value** | Phase 1 – HKD 1.53 billion / USD 195 million\(^1\)
| Phase 2 – Estimated HKD 2.45 billion / USD 312 billion

**Asset Class** | Waste and Water (Solid Waste Management)

### Output Specification Development Approach Used

The output specification is based on the standards and publications of the Government of Hong Kong’s Civil Engineering and Development Department, the Development Bureau and relevant statutory requirements. A detailed specification was developed, listing the type of technology and processes required, and covering both the outputs required and some of the input specifications more typically found in other types of contracting structures. The Private Partner is responsible for design, construction, operation and maintenance, as well as handback. The specification used was bespoke for the contract, although the output specification produced for OPARK1 has been mainly reused for ORRC2 with some flexibility in the surplus renewable energy export (electricity or biogas). Future ORRCs may follow a similar approach, with the potential for refinement from lessons learned. The level of prescriptiveness was considerably higher than other solid waste management PPP projects in Europe and the Middle East. This was intentional as the client had undertaken work prior to procurement to select their preferred technology, and used the contract to deliver the specified technology, with specific performance requirements typically seen in input specifications. There is a balance between the level of prescriptiveness and the requirement for the private sector to offer value for money, and in the case of Hong Kong, the contracts are more prescriptive than seen in other countries for waste PPP contracts.

### Market comparison

Typical waste PPP projects, such as Edinburgh in the United Kingdom (UK), Mexico Energy from Waste, United Arab Emirates (UAE) Energy from Waste, and North London Waste Authority in the UK have a high-level output specification, where the amount of waste to be treated, and a few performance targets are set, but the Private Partner is free to determine the specific technology and the method for achieving the performance standards. Examples of performance requirements would be percentage (by mass) of incoming material which is recycled, percentage which is diverted from landfill and recovery. Recovery can typically be in the form of material or energy (such as compost in an organic treatment plant and electricity and heat production in the thermal treatment plant). The quality of outputs may also be stipulated, but the method for reaching that quality standard has not been seen to be specified in PPPs other than the Hong Kong one.

For this Hong Kong project, an initial environmental permit was applied for before procurement commenced, so technology was relatively fixed for all bidders. The Private Partner was able to suggest changes, but it took the risk of applying for a permit variation. Specifications on the amount of material to be treated, the products to be produced, hours of operation, how air quality requirements are to be met, staff qualifications and further details were included.

It is unusual that a PPP contract targets commercial waste; more typically municipal waste streams are targeted, as this is what local authorities are responsible for managing (e.g. Cardiff and Edinburgh in the UK). There is not a single approach to the classification and regulation of commercial solid waste. For example, in some countries such as Bahrain commercial waste is included in the municipality’s responsibility. However, in other countries, particularly in Europe, because of the way the European Union regulations are set up, commercial waste falls under separate regulations. Commercial waste may be treated at facilities which are developed as part of a PPP project, but this waste would be through separate contracts, (such as Cardiff, West Sussex, Hampshire and Kent in the UK).

In Hong Kong the Owner took the decision that the largest source of food waste would be targeted first. This makes sense, as more people regularly eat at restaurants/food markets in Hong Kong than in other parts of the world. It is also important to take into consideration the responsibility of waste management in each country. In some places,
such as the UAE, almost all waste is the responsibility of the government, whereas in much of Europe, only municipal waste (i.e. not commercial and industrial waste) is the responsibility of the government.

No guarantee was provided regarding input waste quality/composition. This is a key issue for waste contracts, with a number of approaches taken. The most typical approaches are to either guarantee composition or characteristics within bands (such as bands of organics, recyclables and inert materials), such as in Serres in Greece, or to guarantee the collection method and material targeted will not change, such as in Wakefield in the UK, with the Private Partner taking the risk on changes due to lifestyle/new materials entering the waste streams.

### Performance Reviews:
For ORRC2, the Owner intends to engage consultants to undertake contract administration, site supervision of the works and carry out operational performance reviews upon completion of the construction. Independent operational performance reviews are one way to validate the accuracy of the Private Partner’s self-reporting.

### Financial Deductions:
The following are examples of mechanisms and penalties that have been included in the contract to address the unsatisfactory performance of the Private Partner during operation. The financial deductions align with the end user and Owner priorities:
- **Suspension of operation** – If ORRC2 fails to operate on any days, the Government will deduct the corresponding operational fees for that period;
- **Operational requirements** – If the contractor fails to comply with any or all of the operational requirements in the contract for any month, the Government will deduct the relevant fees from the operational fees of the month on a pro rata basis;

### A 15 year contract is shorter than typical solid waste management PPP projects (terms in the range of 25 years are more common) but operations are likely to continue after handback. This may give the client more flexibility over the management of the facility once the operating term of the contract is complete. The ORRC has a higher level of external checking than for many waste management PPP projects, including those developed in the UK and France.

Handback is typically required if the site belongs to the authority, such as in Hong Kong, and not if it is owned by the contractor (which is less common but seen in West Sussex in the UK). The benefit of the authority owning the site is that it encourages as many bidders as possible as they are not required to find and
### Alignment to QI Focus Areas

<table>
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<tr>
<th>Health and safety considerations during both construction and operation of the asset</th>
<th>Mechanisms used to achieve QI alignment</th>
<th>Market Comparison Analysis</th>
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<td>As for any industrial site, the output specification requires a health and safety plan to be followed. This plan is to include identification, control, and mitigation for hazards during construction, operation, and maintenance of the plant. Emergency procedures are also identified. This contract had the input of multiple departments within the government, so specifications from different departments were included. A more typical approach is to specify national legislation along with a small number of additional requirements. Accidents and incidents reportable to the Hong Kong Government Labour Department shall be counted as non-compliances with the environmental and safety performance requirements. Such non-compliances will be measured monthly, based on frequency and severity.</td>
<td>- <em>Environmental requirements</em> – If the contractor fails to comply with any or all of the environmental requirements in the contract for any month, the Government will deduct the relevant fees from the operational fees of the month on a pro rata basis;  - <em>The Government can terminate the contract according to the contractual procedures if necessary.</em></td>
<td>purchase a suitable site themselves. Compared to the solid waste sector, the water and wastewater sectors typically show leadership in the field of asset management. Although output specifications do not always require compliance with the international standard for asset management (ISO 55000), there is a level of maturity in the market that means Private Partners sometimes offer an ISO 55000 compliant solution on their own accord. For example, the private partner (Samra Plant Co) on the As-Samra wastewater treatment plant project in Jordan recently obtained ISO 55000 certification.</td>
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### Payment linked to safety performance

Payment linked to safety performance: The Owner had existing technical guidance that informed the requirements for construction safety management. The payments on safety cover both the task-tied payment items for the implementation of stipulated safety measures, such as provision and updating of safety plan, attending safety meetings and safety walks, provision of safety officers and safety training etc., and the performance-tied payment items, which are measured according to the Private Partner’s achievements in the performance indicators, such as no reportable accidents in a month, accident Some contracts (predominantly in countries with well-developed health and safety regulations such as in the UK and Singapore) limit health and safety requirements to meeting national legislation, but many have specific requirements (for example in Brazil), particularly around vehicle deliveries to a site, where staff from potentially multiple organisations are entering the facility. |
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<td><strong>Ability of the asset to withstand natural and other disasters, including climate change</strong></td>
<td>The Owner transfers geotechnical risk to the Private Partner, who shall carry out all the necessary geotechnical investigations. Design submissions, construction and maintenance of man-made geotechnical features, and natural terrain hazard study and mitigation works, shall be in accordance with the Government of Hong Kong’s Civil Engineering and Development Department Project Administration Handbook for Civil Engineering Works, Appendix 4.8ii. The output specification also addresses site specific risks. For example, during inclement weather events such as strong winds, heavy rains or typhoons, the Private Partner shall take all reasonable measures necessary to ensure that all facilities within the site, including but not limited to skips loaded on mobile plant and skips stored at the waste reception area, are safely secured in order to prevent the facilities from causing damage to any plant, mobile plant and all persons on the Site.</td>
<td>There are no specific mechanisms to achieve this, rather it is stated in the contract requirements so would be the Private Partner’s risk of non-compliance.</td>
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<td><strong>Job creation, capacity building and transfer of knowledge</strong></td>
<td>Operation and maintenance of the facility requires local staff, both skilled and unskilled. When the asset is transferred back to the Owner at the end of the term, there is a benefit to the Owner if the operations and maintenance staff are retained to improve the transfer of knowledge. A Handover Plan is the formal document required to transfer knowledge from the Private Partner to the Owner and is required to provide details on employee retention and training. The output specification includes requirements for building information modelling (BIM) to mitigate construction risks and improve asset management and transfer of knowledge. At an organisation level, the Owner has defined their requirements for BIMiv, which in turn inform the project requirements. The Private Partner shall adopt BIM during the design, construction, and operations stages of the Facility. The output specification provides estimates of the number of technicians and apprentices that may be employed based on the capital cost of the project. Available, skilled labour is a key component to successfully deliver the services. Providing an indication of the number of staff means all proponents are bidding on the same basis, although this can stifle innovation, such as process automation. However, if the Owner’s objective is to create jobs, it provides a level of certainty that the outcome will be achieved. It is estimated that the proposed works will create about 465 jobs (400 for labourers and 65</td>
<td>There are no specific mechanisms such as KPIs or measurable targets for the job creation requirements, however there is a requirement for the Owner to approve all resumés. It is typical that expertise is included in the handback plan. In some contracts, more typically in the early waste management PPP contracts in the UK, (e.g. Isle of Wight and West Sussex), a community liaison officer was a requirement in the contract. This is less common in more recent contracts, with community liaison under the control of the Owner. Waste management facilities require operational staff, and there are often specifications about number of staff who must be recruited from within the local area. Typically, only senior roles will be specified, as it may limit scope for job</td>
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<td>for professional/technical staff) providing a total employment of 12,400 person-months for ORRC2. The experience level of specific staff is prescribed, including degree type and number of years’ experience. This is not just for senior management but a range of posts.</td>
<td>creation if specifications are prescriptive. Some European contracts specify the number of staff who must be employed from within a certain radius of the facility, with the aim of encouraging local labour. Alternatively, there are other projects that do not have the same prescriptive requirements for qualifications and length of experience. In countries where there is age discrimination legislation, specifying the number of years’ experience may not be possible or appropriate.</td>
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<tr>
<td>Environmental impacts</td>
<td>The Owner was responsible for obtaining environmental permits, but the responsibility for meeting the requirements in the permits are then transferred to the Private Partner. An Environmental Impact Assessment (EIA) was undertaken by the Owner prior to procurement, and included expected technology, performance, emissions and output management. The Private Partner had to perform as well or better than the performance stated in the EIA, or apply for a variation to the Environmental Permit. The Private Partner will be required to ensure compliance with the requirements of the Environmental Permit including Environmental Monitoring and Audit (EM&amp;A) requirements. For ORRC2, the requirements also consider ways to mitigate environmental impacts at each stage of the project development. For example: Planning and design stages: Consider ways to minimise the generation of construction waste; reuse inert construction waste (e.g. excavated soil) on site or in other suitable construction sites as far as possible to minimise the disposal of inert construction waste at public fill reception facilities (PFRF); maximise the use of recycled/recyclable inert construction waste, and the use of non-timber formwork to further reduce the generation of construction waste.</td>
<td>Financial deductions: If the Private Partner fails to comply with any or all of the environmental requirements in the contract for any month, the Owner will deduct the relevant fees from the operational fees according to the contract provisions. The requirements in the output specification go beyond simply meeting local legislation. This has been seen, on a lesser scale, in other facilities in the UK (such as for odour treatment technologies) but varies depending on the country. In newer projects in countries with less developed legislation, including additional requirements beyond the existing legislation to meet good practice, such as meeting World Bank standards, depends on the recommendations provided by the Owner’s advisers. This may also be a funding requirement from some development banks.</td>
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<td><strong>Construction stage:</strong> At the construction stage, the Private Partner is required to submit for approval a plan setting out the waste management measures, which will include appropriate mitigation means to avoid, reduce, reuse and recycle inert construction waste. Day-to-day operations on site will need to comply with the approved plan, and the contractor will be required to separate the inert portion from non-inert construction waste on site for disposal at appropriate facilities. The disposal of inert and non-inert construction waste at PFRF and landfills respectively will be controlled through a trip-ticket system.</td>
<td></td>
<td>The bidders, and subsequently the Private Partner, in this project were limited in the changes to the design which could be made, as the specification detailed design and materials etc. This is not typical for a waste PPP project, where usually the bidders are invited to come up with the most environmentally beneficial design possible, within affordability limits, and this is part of the evaluation scoring, such as Cardiff Organic Waste Treatment Project in the UK.</td>
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<td><strong>Operations:</strong> There is strict control over odour nuisance which may arise during the operation stage from both the facility and food waste collection vehicles (FWCVs). Waste water generated during the operation will first be treated by on-site sewage treatment facilities to meet relevant discharge standards before being discharged through public sewers to public sewage treatment facilities for final treatment and discharge.</td>
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The plant is predominantly electrically self-sufficient, with power being produced using biogas generated at the facility. For OPARK1, surplus electricity is exported. For ORRC2, either (1) surplus electricity is exported to the grid, or (2) surplus biogas is exported.

<p>| Ability of the asset to respond to changes in resource availability, population levels, demographics and disruptive technology | Proven technology was required, which is typical for waste PPP projects. However, food waste composition is different in Hong Kong to other countries, due to different eating habits and food eaten. The design of internationally proven technology had to take this into consideration to develop a facility that could optimise biogas yield based on the expect food waste composition. In addition, the site areas were small, so innovations were required to meet the capacity specifications (200tpd for OPARK1 and 300tpd for ORRC2). The Owner defined the required capacity, which is a small proportion of the total estimated food waste arising in Hong Kong, so waste availability is unlikely to impact the project. The government is taking an innovative approach to procurement by letting a number of contracts over a period of time, so that capacity is developed as source-segregated organic waste collections are introduced. |  | The ORRC projects are unusual in not guaranteeing exclusivity, waste composition or waste tonnages. The two risks (composition and tonnage of waste) are the key issues when developing a PPP project. For a food waste contract, the risk of change of composition is lower than for residual waste, as foods do not change as quickly as packaging and consumer preferences for items such as clothes and electronic goods. There is no single model used but typical approaches include having a guaranteed minimum |
| Non-compliance event: The Private Partner would be exposed to potential financial deductions if the specified capacity is not achieved. |  |  |</p>
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<td>tonnage (take or pay) (Cardiff Organic Waste Treatment Contract), exclusivity of waste provision to the PPP facility (Wakefield residual waste treatment project) or no guarantee but the inclusion of the responsibility for collection (Hong Kong Waste Electronic and Electrical Equipment PPP project).</td>
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**Project Name**  
Agadir Mutualized Desalination Plant

**Description**  
Water stocks in the farming areas of Agadir, Morocco were seven times lower in 2008 than in 1982, and the average rainfall is expected to decline in the coming decades. Much of the water goes to tourism and agriculture; the industries upon which the region's economy depends but which are currently being held back by water shortages. The Chouka region employs about 100,000 people in the agricultural sector, and the tourist industry is booming leading to ever greater demand.

Thus, Agadir is alleviating a drought crisis by building a mutualised (drinking and irrigation water) desalination plant with an initial 275,000 m³ total production capacity of desalinated water per day, which will make it, at the time of construction, the world's largest desalination plant designed for drinking and irrigation water that will run entirely on solar energy. The project design also allows for a possible capacity expansion to up to 400,000 m³/day. This seawater desalination plant is expected to secure the supply of drinking water for 2.3 million inhabitants by 2030, 20% of whom live in rural areas.

This is a single project for two Owners; Office National de l'Electricité et de l'Eau Potable (ONEE), the Ministry of Agriculture, Sea Fisheries and Rural Development and the Ministry of Waters and Forests of Morocco, which has been created by combining two projects; one for drinking water and one for irrigation. The first one requires a 50% expansion of drinking water production capacity under the contract that Abengoa has been developing for ONEE, thereby increasing plant capacity to 150,000 m³/d of drinking water. The second project calls for the additional production of 125,000 m³/d of irrigation water, as well as the construction of the corresponding irrigation network for a total of 13,600 ha, promoted by the Ministry of Agriculture. Construction of the first phase started in July 2018. Works are still in progress with the anticipated commissioning date in 2020.

**Location**  
Agadir region, Morocco

**Owner**  
Ministère de l'Agriculture et de la Pêche Maritime (MAPM)/ Office National de l'Electricité et de l'Eau Potable (ONEE)

**Private Partner**  
Abengoa and InfraMaroc (CDG Capital Infrastructures group)
**Project Name**: Agadir Mutualized Desalination Plant

**PPP Model**: Design-build-finance-operate-maintain (DBFOM)

**Contract value**: EUR 309 million / USD 346 million

**Operating Term**: 30 years

**Asset Class**: Water and Waste (Water Supply)

### Output Specifications Development Approach Used

The output specification is detailed and builds on the regional experience delivering desalination projects. The specification details the type of technology and the required processes. The "Programme fonctionnel", or specification includes: general requirements for a mutualised project; and, requirements for: sea water intake; civil engineering works; hydro-electrical and mechanical works; electrical works; and control and supervision of operation and maintenance.

### Alignment to QI Focus Areas

| Sustainability and longevity of an infrastructure asset. | An objective of the project is to provide a secure source of clean water to the farming and tourism sectors in the Agadir region. There are two main performance requirements, which are linked to payment, to support this objective: 1) water quality and 2) volume. These KPIs are output based, allowing the Private Partner to develop a solution that they consider best balances risk mitigation and project cost.

The output specification also includes redundancy requirements to minimise the likelihood that end users are impacted by outages. This also supports asset maintenance as it improves the Private Partners’ access to complete planned maintenance and their ability to quickly respond to reactive requirements. The output specification achieves this by requiring a buffer equivalent to five hours at full production. |
| --- | --- |
| Ability of the asset to address the needs and meet the expectations of end users | **Mechanisms to achieve QI alignment**

**Performance KPIs**: The volume and water quality KPIs are tracked daily from a remote service centre in Seville, Spain. Payments to the Private Partner are subject to deductions based on the KPI performance. The Private Partner is responsible for self-reporting performance on a monthly basis in order to administer the contract and payments, and calculate the deductions. The plant team (located on site) includes the Private Partner representatives to allow for a timely response to issues. Any deviation from the production quality and quantity immediately impact revenues. In case of repeated deviations, both in terms of gravity and of length in time, may lead to warning, and replacement of the Operator if needed.

**Serious breach**: The Private Partner remuneration is partially based on the volume and quality of water produced. The Volume KPI is used to track if the plant delivered the expected daily volume as asked for by the Public Water Agency, ONEE. Moreover, any lack of production implies a lower |

### Market Comparison Analysis

The output specifications require a mutualised desalination plant for both drinking water and irrigation water. This is a unique approach, using two production lines in parallel on the same site, compared to other desalination projects, and allows for greater redundancy, and ultimately resilience of the asset and the service it delivers.
## Reference Guide: Output Specifications for Quality Infrastructure

### Waste and Water Case Study: Agadir Mutualised Desalination Plant

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| **Ability of the asset to withstand natural and other disasters, including climate change** | The project provides essential infrastructure that will lead to population growth and economic development in the Agadir region. The Owner recognised the need to develop resilient infrastructure that could withstand the location-specific risks, such as flooding and sea level rise. For example:  
- **Flood/sea level rise**: The Owner recognised the best mitigation for flood risk was site selection. The project is therefore located on an elevated site 40 metres above sea level.  
The requirements also address climate change adaptation:  
- **Adaptation**: In the event of sea water temperature rises, the specification requires the quality of water to be maintained, however the volume can be reduced. The contract specifies a sea water temperature of 13 to 25 °C (estimated average is 20°C) but doesn't detail consequences of water above 25°C, which is considered improbable, given the depth of the sea intake. | **Design Compliance**: The Private Partner is responsible for delivering a compliant design in order to receive the service payments. The Owner had the opportunity to review the design at stages throughout the design development process. Although the Owner reviews the design, they do not assume any of the risk that the design is still deemed non-compliant through the construction completion process.  
*Compared to other sea-side desalination plants, this plant is at a higher elevation above sea level. Strategic decisions on the approach to address resilience would typically be addressed at business case stage and the project budget developed to reflect additional design and construction or land costs.* |
| **Environmental impacts** | The Owner required that the energy to power the asset was to be generated from renewable sources, and also wanted to minimise energy consumption. Rather than including a specific requirement for energy consumption, the output specifications incentivises the Private Partner to optimise the plant and minimise energy use by linking payment to energy consumption. This approach allows the Private Partner to make trade-offs between energy costs over the term and a design solution above minimum requirements. As a result, the Private Partner decided to include an energy harvesting turbine, which reduces the overall energy use of the facility. | **Energy Performance**: A financial performance incentive links remuneration to energy consumption. The Private Partner can increase their profit by decreasing energy consumption through technology or management processes. However, if the energy consumption is greater than expected, the Private Partner is exposed to the additional costs.  
The approach to use energy targets or incentive payments (as opposed to specification requirements) is a common approach across different asset classes to promote the Private Partner to reduce energy consumption. |
<p>| <strong>Ability of the asset to respond to changes in resource availability, population levels,</strong> | The Owner considers technology risk, changing demographics and demands and new technology opportunities in the output specification. | <strong>Technology watch</strong>: The Private Partner can propose new technologies throughout the project term to allow the Owner to incorporate new and For projects that have a critical technology component, such as waste projects, it is common for the Owner to require proven |</p>
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<td>demographics and disruptive technology</td>
<td>• <strong>Proven technology:</strong> The output specifications require only the use of Reverse Osmosis to be used for the desalination process, with relatively detailed design specifications</td>
<td>emerging technologies. This is allowed in the Concession agreement, not in the output specifications. The Private Partner can introduce new technologies as long as it does not modify the economic equilibrium of the project, unless the technology initially used is not available on the market anymore.</td>
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<td>• <strong>Changing demographics and demands:</strong> An asset that provides both drinking and irrigation water provides more flexibility to respond to changing water demands. The plant has been designed, based on the output specifications, to allow a capacity increase by installing more industrial equipment. It also allows de facto a redundancy that allows for balancing both productions if need be.</td>
<td>technology. This is often considered at the request for qualifications stage, where teams are shortlisted on the basis they have completed projects of similar scope and scale. This prevents bidders who do not have the relevant experience from proceeding to the request for proposal stage, and provides increased confidence that multiple compliant bids are received.</td>
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<td>• <strong>New technology:</strong> Redundancy in the design allows for partial insertion of new desalination technology, in the case new and more efficient technologies come to market during the asset lifetime.</td>
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Water and Waste: Summary of End Notes

Hong Kong Organic Resource Recovery Centre

\(^{1}\) Assumed conversion rate of HKD/USD = 7.8 as at May 15, 2019


Agadir Mutualised Desalination Plant

\(^{5}\) Assumed conversion rate of EUR/USD = 1.12 as at May 15, 2019